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April 27, 2021 at 3:03:14 PM EDT

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United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722

Honorable A. Kathleen Tomlinson
United States Magistrate Judge
United States District Court

Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

April 27, 2021

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ **APR 28 2021** ★

LONG ISLAND OFFICE

Re: *Ajay Bahl v. New York College of Osteopathic Medicine of New York Institute of Technology, et al., 14-CV-04020 (AKT)*

Dear Judge Tomlinson:

Plaintiff Ajay Bahl in the above above-referenced action writes to respectfully request a one-week extension from the ordered April 28, 2021 deadline to May 5, 2021 for submission of the status report. This is plaintiff's first request for extension, as the previous two extension request were not joint requests as they were accordingly due to the needs of defendant NYIT. No other scheduling deadlines will be affected. Opposing counsel for NYIT consent to the 1-week extension. Plaintiff's request this extension in part due to needing more time to review a recently received 14-page responsive document to a request that has been pending for over 5 years, and also due to needing more time to review and confer the first draft of defendants proposed letter that was provided within past week. Plaintiff has final examinations for his fall term this week and made repeated efforts to attempt to engage Defendants early in the month when he was more available. Plaintiff has continued to confer with the pro se legal assistance office, however, despite best efforts the process has been incredibly challenging. Considering the court's 4/16 order stating the court does not intend to extend the date further, plaintiff request in the alternative (if the general request for extension of joint status report is not granted), the court allow for a 1 week of extension to May 5 of plaintiff's bullet point list of outstanding discovery items initially ordered to be included at the end of status report. Thank you for Your Honor's consideration of Plaintiff's request.

Respectfully Submitted,

Plaintiff

/s/
Ajay Bahl

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